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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SHAUN TAYLOR,

Plaintiff,

vs.

CLARK COUNTY SCHOOL DISTRICT;
KEITH FRANCE, an individual; DOES 1
through X; and ROE CORPORATIONS 1
through X,

Defendant.

CASE NO.: 2:19-cv-00999-GMN-GWF

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

Plaintiff Shaun Taylor ("Plaintiff") and Defendants Clark County School District and Keith France (collectively, "Defendants"), by and through their respective attorneys of record, hereby stipulate to extend the time for Defendants to file a response to Plaintiff's Complaint (ECF No. 1) from the current deadlines of September 24, 2019 (as to Defendant Clark County School District) and September 26, 2019 (as to Defendant Keith France), up to and including **October 8, 2019**. This is the first request for an extension of time to respond to Plaintiff's Complaint.

Defendants seek the extension of time to allow sufficient time to prepare an appropriate response to the Complaint. Plaintiff served Defendant Clark County School District with process on September 3, 2019, rendering a response due on September 24, 2019. Fed. R. Civ. P. 12.

1 Plaintiff served Defendant Keith France with process on September 5, 2019, rendering a response
2 due on September 26, 2019. Fed. R. Civ. P. 12. Because this is Plaintiff's second lawsuit against
3 Defendants and the former was partly adjudicated in Defendants' favor (Case No.: 2:18-cv-01264-
4 KJD-VCF), counsel requires additional time to evaluate and address potential res judicata and
5 collateral estoppel concerns. Further, Defendants' counsel was out of the country through
6 September 15, 2019 and is unable to properly evaluate and prepare a response by the current
7 responsive deadlines in light of other deadlines and prior commitments.

8 Based on the foregoing, the parties hereby stipulate to a short extension of time, until
9 October 8, 2019, for Defendants Clark County School District and Keith France to respond to the
10 Complaint. The extension to answer or otherwise response to the Complaint will have no
11 significant or prejudicial impact on the proceedings.

12 This request is made in good faith and not for the purpose of delay.

13
14 Dated: September 19, 2019

Dated: September 19, 2019

15 LAW OFFICE OF DAN M. WINDER P.C.

CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

16 By: /s/ Angela Lizada
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22 **ORDER**

23
24 **IT IS SO ORDERED.**

25 DATED: September 20, 2019.

26
27 
28 UNITED STATES MAGISTRATE JUDGE